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February 23, 2021

Via ECF

Honorable Madeline Cox Arleo
United States District Judge
Martin Luther King, Jr. Federal
Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

RE: United States v. Paul Parmar, Criminal No. 2:18-cr-00735-MCA
Request to Amend Motion Schedule

Dear Judge Arleo:

I am writing to respectfully request a modification of the motion schedule previously extended by this Court. At the time that the motion schedule was previously set and extended, it was the belief of the parties that the discovery process was complete. However, the Government has just received a belated response to one of its subpoenas which will result in an additional production.

As this Court noted in the aforementioned Order, this matter is a complex case within the meaning of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(ii). The parties have been actively attempting to move the discovery and motion process along at a reasonable pace, but the process is not yet complete.

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This Court's most recent Order set March 4, 2021, for the defense to file motions, with a response date by the Government of April 5, 2021 and a reply date, if any, by April 19, 2021. I have spoken with counsel for the co-defendant and the Government, and it is currently the belief of the parties that the Government should complete the provision of this new production of discovery during the week of March 15, 2021.

The Government has received thousands of documents, however it is their belief that most of it is duplicative of prior discovery and that the new material will be far more limited. Assuming that is an accurate picture, we request the following: defense motions to be due on April 15, 2021, with the Government response due May 13, 2021, and any reply by the defendants due May 27, 2021.

Counsel for Mr. Bakhshi joins in this application, and the Government has also consented to this request. Assuming that the production is received in the currently anticipated timeframe, this schedule should allow the motion process to proceed.

Respectfully submitted,

S/ Jeffrey C. Hoffman

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